

United States Attorney Southern District of New York

United States District Courthouse 300 Quarropas Street White Plains, New York 10601

April 9, 2008

MEMO ENDORSED

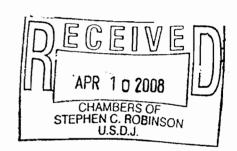
BY HAND

The Honorable Stephen C. Robinson United States District Judge Southern District of New York 300 Quarropas Street White Plains, NY 10601

Re:

United States v. Curtis Quinones,

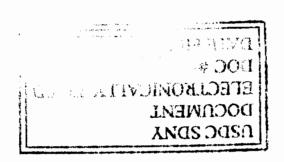
08 Cr. 114 (SCR)



Dear Judge Robinson:

With the consent of defense counsel, the Government respectfully requests that:

- (1) The Court revise the current briefing schedule for motions based upon defense counsel's April 4, 2008 request that the motion schedule be adjourned two months from April 7, 2008 to June 2008. After consulting with defense counsel, the parties propose that defense pre-trial motions be filed on or before June 9, 2008, the Government's response to those motions be filed on or before June 30, 2008, and the defendant's reply be filed on or before July 14, 2008. The parties would appear in court for a decision on the motions and/or a pre-trial conference on August 1, 2008.
- (2) Pursuant to defense counsel's April 4, 2008 letter and my conversation with defense counsel on April 9, 2008 in which defense counsel consented to this schedule and agreed that time should be excluded under the Speedy Trial Act until August 1, 2008, the Government requests that time be excluded until August 1, 2008 from the speedy trial calendar based on a finding that the ends of justice served by the continuance outweigh the best interests of the public and the defendants in a speedy trial under 18 U.S.C. § 3161 (h)(1)(F) & (h)(8)(A).



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A copy of defense counsel's April 4, 2008 letter is attached to this submission.

Respectfully submitted,

MICHAEL J. GARCIA United States Attorney

John P. Collins, Jr

Assistant United States Attorney

(914) 993-1919

cc: Susanne Brody, Esq. (By hand)

SO ORDERED:

Hon. Stephen C. Robinson

United States District Judge